

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

J. Keith Radecic,
Plaintiff

*

*

*

v.

* Docket No.: 1:20-CV-00495-AJ

*

Southern New Hampshire
Radiology Consultants, P.C.,
Defendant

*

*

*

JOINT MOTION TO AMEND THE DISCOVERY PLAN

Pursuant to Fed. R. Civ. P. 6(b)(1) and 7(b), the parties hereby move this Honorable Court to modify its Scheduling Order, dated July 17, 2020, Document 8. Specifically, the parties request that the Court modify the discovery schedule as follows:

1. Expert Disclosures and Reports, New Deadline: Plaintiff, June 1, 2021;
Defendant, August 1, 2021.
2. Completion of Discovery, New Deadline: November 15, 2021.
3. Motions for Summary Judgement, New Deadline December 15, 2021.

The parties state that there have delays in procuring medical records and other documents with the result that no depositions have taken place as of yet.

Wherefore, for the foregoing reasons, the parties request that the foregoing deadlines be substituted for those set forth in the Court's Scheduling Order, dated July 17, 2020, Document 8.

Respectfully submitted,

By: \s\ Francis G. Murphy

Francis Murphy, Esquire

NH BAR ID 1840

Attorney for Plaintiff

180 Bridge Street

Manchester, NH 03104

(603) 669-8080

fmurphy@shaheengordon.com

By: \s\Mark V. Franco

Mark V. Franco, Esquire

Bar No. 16708

Attorney for Defendant

DRUMMOND WOODSUM

84 Marginal Way, Suite 600

Portland, ME 04101-2480

mfranco@dwmlaw.com

Dated: 03/12/21